

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA, )  
                                  )  
Plaintiff,                    )  
                                  )  
vs.                            )                            Civil No. 16-351  
                                  )  
                                  )  
BRETE L. CARLSEN a/k/a BRETE LEE CARSEN,    )  
                                  )  
Defendant.                    )

COMPLAINT

Plaintiff, United States of America, acting herein by the United States Attorney for the District of New Mexico, complains and alleges:

That this action is brought by the United States of America, with jurisdiction provided by 28 U.S.C., Section 1345.

1. That defendant, Brete L. Carlsen a/k/a Brete Lee Carsen, is a resident of the State of New Mexico within the jurisdiction of this Court.
2. Because this is a Government Collection Action to recover monies owed to a governmental agency, this action should be excluded from Pretrial Case Management procedures as provided by D.N.M.LR-Civ.16.3(a).
3. That the defendant is indebted to the plaintiff in the principal amount of \$88,437.97, plus interest on this principal computed at the rate of 3.25 percent per annum in the amount of \$1,733.02 as of April 07,2016, and interest continuing thereafter on this principal at the rate of 3.25 percent annum, until the date of judgment. See Exhibit "1" attached hereto and incorporated herein. The Certification of Indebtedness is attached hereto as EXHIBIT "2".

4. Demand has been made upon the defendant by the plaintiff for the sum due but the amount due remains unpaid.

Wherefore, the plaintiff prays judgment against the defendant for the total of \$90,170.99, inclusive of interest of \$1,733.02 at 3.25 percent per annum on the principal of \$88,437.97 which has accrued as of April 07, 2016, and will continue to accrue until date of judgment. Plaintiff further demands, pursuant to 28 U.S.C., Section 1961, that interest on the judgment be at the legal rate until paid in full, U.S. District Court Clerk Docket Fees in the amount of \$400.00 as provided by 28 U.S.C., Section 1914(a), plus costs of this action and such other and further relief as the Court may deem just and proper.

Dated this 27th day of April 2016.

UNITED STATES OF AMERICA

DAMON P. MARTINEZ  
United States Attorney

/s/

Electronic Filed April 27,2016  
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